

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

PATRICK NAGORSKI

§

§

V.

§

C.A. NO.: 4:23-cv-02860

§

HARRIS COUNTY, TEXAS

§

FIRST SUPPLEMENT TO JOINT PRETRIAL ORDER [DOC. 72]

TO THE HONORABLE DAVID HITTNER:

COMES NOW, Plaintiff, Patrick Nagorski (hereinafter “Plaintiff”) and Defendant, Harris County, Texas (hereinafter “Defendant”), and file this First Supplement to Joint Pretrial Order [Doc. 72].

1. As supplement, attached hereto as Exhibit K is the Parties’ Joint Jury Charge, Instructions and Interrogatories.

2. As supplement, here follows the Parties’ Agreed Proposed Joint Statement of the Case to be read to the jury:

Agreed Proposed Joint Statement of the Case

1. This is an employment discrimination case alleging disability discrimination and failure to accommodate under the American with Disabilities Act of 1990 (the “ADA”) (42 U.S.C. § 12101, *et seq.*) and the Americans with Disabilities Act Amendments Act of 2008 (the “ADAAA”).

2. In this case, Plaintiff Patrick Nagorski worked as an Assistant County Attorney for Defendant Harris County, Texas' County Attorney's Office. Mr. Nagorski alleges that in 2021 and 2022, he had a disability and during this time-period requested accommodation under the ADA from Harris County. Mr. Nagorski alleges that Harris County failed to provide accommodation and discriminated against him due to his disability.

3. Harris County asserts that it did accommodate any alleged disability claimed by Mr. Nagorski and denies that it discriminated against Mr. Nagorski because of his alleged disability. Harris County asserts that any actions taken related to Mr. Nagorski's employment were done for legitimate non-discriminatory reasons.

Respectfully submitted,

THE GABBERT LAW FIRM

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ATTORNEYS FOR DEFENDANT**CERTIFICATE OF SERVICE**

I certify that on March 17, 2025, a true and correct copy of the above and foregoing was served upon all attorneys of record pursuant to the Federal Rules of Civil Procedure.

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